

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

ALLEN HAMILTON and LOIS  
HAMILTON, husband and wife,

Plaintiffs,

vs.

SILVEN, SCHMEITS & VAUGHAN,  
PC, an Oregon Professional  
Corporation, and ALAN J.  
SCHMEITS,

Defendants.

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RECEIVED  
JUL 23 2010  
YTURRI ROSE LLP

DEPOSITION OF ALLEN HAMILTON  
Taken in behalf of the Defendants

Baker City, Oregon

July 21, 2010

Jeannine K. Manny  
Certified Shorthand Reporter  
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EXHIBIT

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OF

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ALLEN HAMILTON - by Mr. Burnham

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1 chemicals in the past, with the toxic exposure to manganese and  
2 isocyanates, and I seen what happened with that incident, and  
3 it was like, we can't live here, we got to get out of here.

4 Q But you never saw a doctor?

5 A No.

6 Q Did your wife ever see a doctor, that you're aware of?

7 A My wife's been up to Harborview because of the  
8 chemicals, Harborview Medical Center over on the coast.

9 Q When did she go to Harborview Medical Center?

10 A A couple months ago.

11 Q But the exposure was 2006, and she didn't go to  
12 Harborview until 2010?

13 A My wife, like I said, has been very ill for a long  
14 time from the chemicals, and we decided that she needed some  
15 kind of medical treatment. My wife, her heart has been  
16 bothering her, she's got some lumps on her neck that have  
17 started to form in here, and like I said, her heart is  
18 bothering her, she's exhausted all the time and can't function.  
19 We had to get some medical treatment.

20 Q I understand that, but what I'm saying is, she was  
21 exposed to chemical, according to you, in 2006, and the first  
22 time that she got medical treatment that you're aware of is  
23 2010?

24 A I know she previously went down to Valley  
25 Environmental Health over on the coast, you know. I can't